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Part 2A of Form ADV: Firm Brochure

Item 1 / Cover Page:

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A) Home Office:

Sona Financial LLC. 7600 Walnut Curve Chanhassen, MN 55317

Remote Office (no client records held here):

4940 W 77th St, Edina, MN 55435

www.SonaFinancial.com

B) This brochure provides information about the qualifications and business practices of Sona Financial. If you have any questions about the contents of our brochure, please contact us at 952-412-6002. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sona Financial LLC. Is also is available on the SEC's website at www.adviserinfo.sec.gov.

C) Sona Financial being a Registered Investment Advisor (RIA) in no way implies a certain level of skill or training

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Item 2 / Material Changes

As of January 1, 2017, the only material changes for Sona Financial, LLC included the change in the fee schedule and that Mark is no longer acting CFO for Benchmark Clinical Pharmacists, as of August 1, 2017. Mark is still 5% owner for Benchmark.



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Item 4 / Advisory Business

A) Sona Financial LLC (Sona) was established around 1/1/2016. Mark Struthers is 100% owner. Sona Financial LLC specializes in holistic fee-only investment and financial planning. All the firm's major decisions of a strategic and administrative nature for the firm are undertaken by Mark Struthers.

This narrative brochure provides clients with information regarding Sona and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of Sona.

Our Process

Sona's definition of holistic financial planning includes the following types of planning:



Step 1: No-obligation virtual meeting or phone call

During this step Sona's services are described and what the client is looking for is

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discussed. This get-to-know-you step allows both parties to see if the engagement is a good fit. The outcomes of this meeting should include:

- An adequate to good understanding of Sona Financial, LLC services.
- The scope of the possible engagement
- Work through a Financial Life Landscape to define, clarify, and add color to the client's goals and values and how a financial plan will enhance those values.
- Determine the most appropriate service.
- Answer any questions about the role Sona would play and address concerns
- Determine if Sona Financial, LLC will add value to the client's financial life

If the engagement is a good fit, then the appropriate forms are sent.

Step 2: Electronic Forms

- The following forms are emailed or accessed through the client portal:
 - The Financial Services Contract
 - o Form ADV Part2 is delivered
 - o Privacy Policy is delivered
 - o Risk Questionnaire (if applicable)
 - Client Questionnaire (if applicable)
 - An electronic payment request from PaySimple
 - o Payment can be either by ACH (Bank) or by Credit Card
 - The amount initially requested will depend on the level of engagement:
 - For those benefiting from our Financially Fit & Focused ongoing planning and investment services, the amount requested will be ½ the one-time planning fee of \$999, or \$499.
 - For the complete Financially Fit and Focused One-Time Financial Plan, the amount requested will be ½ of the planning fee (this service will only be offered on rare occasions)
 - For the Student Loan Analysis, the amount requested will be ½ of the one-time fee (this service will not be consistently offered)
 - For the hourly engagement, the amount requested will be for the initial hour, or \$200-\$300 (this service will only be offered on rare occasions)
 - Any one-time remaining billable amount will be billed within 30 days of delivery of the review, analysis, or plan.
 - A separate request for payment/invoice will be sent.
 - Any payment for ongoing services will be done via PaySimple on a monthly basis or taken directly from investment portfolio on a quarterly basis.

Step 3: Gather Client Data

• This step is driven by client preference and level of engagement

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- Shorter engagements and virtual clients are done completely online
- Local clients that have the One-Time Complete Financial Plan or the ongoing retainer or AUM model, the client gathering may be done online or via a Get-Organized Meeting
 - For a Get-Organized Meeting, Mark or a Sona employee will help find and input client information in their home or in one of our offices

Step 4: Analysis and Follow-Up Meetings

• Depending on need and level of service, follow up meetings and communication take place to analyze the client's situation.

Step 5: Submission of Final Plan and Follow Up

- Usually done virtually.
- All engagements allow for follow up either in person, virtually, or via email

Sona's investment philosophy is unique. Utilizing the best of passive and factor-based investing, Sona is able to achieve the client's risk/return profile at the best possible cost. Factor-based investing tries to take advantage of factors of return.

The investment piece is only part of the story. Sona integrates the characteristics of the investment portfolio into the client's financial plan. For the client to succeed, every aspect of the client's tax, income needs, personal spending, and goals must be taken into account. Sona works not only with clients in their 50s and 60s but also with Gen Y&X. Many of Sona's clients are young professionals. Sona specializes in:

- o Small-business retirement-plan setup
- o Small-business 401k management (participant level, not plan level)
- o Retirement and tax savings for young professionals
- o Parents taking care of parents The Sandwich Generation
- o Income-Based Student Loan Repayment Options
- B) Fees will be deducted from the client accounts or billed directly through PaySimple. Accounts are most often reallocated quarterly and the designated cash allocation will take any pending fees into account.
- C) In order for advice to have value, it must be tailored. Sona has its proprietary models but customize those portfolios based on client need. Sona will also construct socially conscious portfolios when needed.

Any restriction in using a security or asset is based on client wishes or lack of understanding. If the security contributes to achieving the client's optimum risk/return profile at an affordable cost, Sona Financial will use it.

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D) Sona Financial does not offer a wrap fee program. Sona charges a flat one-time planning fee and either a monthly/quarterly retainer fee for assets held away OR an assets-under-management fee (AUM) fee, not both. Custody of non-traditional 401k funds will be held at a discount-type brokerage house, most often TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC. The client pays the small transaction and custody fee which is separate from the retainer fee or AUM fee. The cost of the transactions is taken into account when the retainer fee is set. There is no commission charged by Sona. The custodian charges all trade or transaction costs. The client will be made aware of the fee, however small.

For traditional 401ks the custodian will most often be through the bundled service of Employer Fiduciary with MG Trust as custodian. Sona will assist with selection of the ERISA plan-level fiduciary, TPA, Record-keeper, and custodian. Sona's role will then be one of participant-level education and guidance.

- E) Sona manages all client assets on a discretionary basis. This does not apply to one-time planning engagements, or where the assets are held away under the retainer model service. For the retainer-service model, Sona will direct the client as to how to rebalance the account.
- F) Sona only directly manages client assets when it is best for the client.

Item 5 / Fees and Compensation

A) Be Financially Fit & Focused: Comprehensive Planning, Ongoing Planning and Coaching, and Asset Management

Cost: The initial one-time planning fee is \$999 with either a monthly retainer for assets held away or for assets held by Sona an AUM fee is charged (custody at TD Ameritrade):

Dollar	Range	AUM %
\$0	\$99,999	0.90%
\$100,000	\$249,999	0.85%
\$250,000	\$499,999	0.80%
\$500,000	\$999,999	0.75%
\$1,000,000	<i>\$2,</i> 999,999	0.70%

The rate for accounts above \$3,000,000 is negotiable but will usually range from 0.50% to 0.65%.

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Minimum annual retainer fee (if assets are held outside of Sona) is \$2,000 and the minimum annual AUM fee for those assets managed by Sona with TD Ameritrade as custodian is \$1,750. Can be billed monthly or quarterly.

Fit & Focused is perfect for the client looking to have clarity and fitness around their financial life. Like running a race, financial fitness is about making the most of what the client has. The confidence, peace of mind, and time saved during this ongoing service, which will allow the client to focus what really matters to them.

What's included? Planning:

- Financially Fit & Focused is a subscription-based or AUM-based package. You can expect the following:
 - 2-4 60-minute meetings in person or via telephone/Skype where financial goals and values are clarified, an overview of the current financial picture (including assets, debts, income and spending), and what current limitations or hurdles the client is facing.
 - A 60-minute call/meeting to deliver a 20-45 pages of financial planning recommendations, actions items, and a prioritized "To-Do" list.
 - A 45-minute check-in phone call within one month of the recommendations delivery.
 - Ongoing check-ins via phone or e-mail for accountability, encouragement and to address changes along the way.
 - A CFP® the client can reach out to as your situation changes or for any questions you may have.
 - A CFA managing their investments, either at other institutions or with Sona's Dimensional-based portfolios, custody at TD Ameritrade

Topics, areas and issues addressed may include the following:

- o Emergency, Retirement and Goal savings
- o Cash Flow and Spending Management
- Retirement Planning
- Investing
- o Big Purchase Planning
- Debt Repayment
- Asset Allocation

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- Tax planning
- o Reviewing your benefits
- o Estate planning needs
- o Education Planning
- o Risk Management
- o Long-Term-Care

Do Your College-Choice Homework

Cost: One-Time \$299

Large Investments Require Being Proactive, College Is No Exception

With costs easily topping \$100,000 to \$200,000 you have to be an informed buyer.

That means being proactive instead of reactive. Finding the best strategy for paying for college can help preserve assets and income for retirement.

Why is our Do Your College-Choice Homework useful?

Simplify the college-planning process by:

- Understanding what colleges expect you to pay
- Understanding where EFC is coming from
- Knowing how to position assets to maximize FASFA & CSS
- Understanding total 4-year net cost
- Understanding financial and academic positioning
- Putting you in the best position to choose the best value

What Post Graduation Looks Like

- Expected student loan debt at graduation
- Show 8 possible repayment options
- Address possible loan forgiveness

Student Loan Analysis

This service will NOT be offered on a consistent basis

Cost: One-Time: \$399 to 599 (Depending on complexity)

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Student loan repayment options are complex. A third-party analysis and opinion can give you:

- Peace of mind
- A better understanding of one of your biggest liabilities
- A better understanding of the risks and benefits
- More confidence in your decision making
- Give 2-3 cash flow scenarios to give you options and explain recommendation

Why is our student loan analysis useful?

- Provide opinions and an overview of different repayment options
- Offer detailed pros & cons of the 2-3 major options as it pertains to your situation
- Use own models to analyze and visually present options
- Give a recommendation option based on the criteria given
- · Overview of impact on other parts of financial life

What's included?

- A free 20-minute call to see if we can be of help
- A 60-minute phone/virtual call for you to ask questions and to gather information
- A 3-6 Page analysis and recommendations with customized projections

One-Time Financially Fit & Focused Financial Planning

This service is will ONLY be offered from time to time -- NOT on a consistent basis

Cost: One-Time Fee of \$1,999 to 3,999 (Depending on complexity)

Provides the same initial holistic complete financial plan as the Ongoing Financially Fit & Focused without the ongoing services. The initial 2-4 meetings and the document produced are the same.

Hourly Engagement

Will ONLY be offered on very RARE Occasions, NOT on a consistent basis

Cost: \$200-\$300 per hour for the first 2 hours and \$150 per hour after

• 2 hours minimum

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• Billed in ½ increments.

Small-Business 401k Retirement Plan Setup

Sona will assist the business owner with TPA, Record-Keeper, Custodian, and ERISA Plan-Level Fiduciary selection. Although, for smaller plans we will most often recommend Employee Fiduciary as TPA and Record-Keeper, with MG Trust as custodian. This offers a low-cost, transparent, turnkey service with access to many of the same investments that Sona uses in its portfolios, like Dimensional, Vanguard funds, and ETFs. Their no-commission, low-cost, client-first, philosophy fits in well with Sona's culture and the way we treat our clients.

Employee Fiduciary's RIA will also act as the ERISA Fiduciary by choosing the fund lineup with the business owner (3(38) plan-level services). Sona's role will be one of investment advisor (3(21) participant-level services) for the account, in meeting with and advising participants with investment selection and ongoing education.

Sona will insist on an open-architecture plan. It is what is best for the participant and is part of Sona's fiduciary culture. Sona will also not work with a mutual fund family or an insurance company Record-Keeper. The fees are not transparent, are usually high, and there are many conflicts of interest.

Cost: \$1499 one-time consultation and setup fee + ongoing participant-level advisory and education fee of plan assets:

\$0	-	\$249,999	=	0.55%
\$250,000	-	\$999,999	=	0.50%
\$1,000,000	-	\$2,999,999	=	0.45%
\$3,000,000+			=	0.30% & No Setup Fee

What's included?

- 3-4 one-hour consultative meetings to flush out the right plan for you and your business
 - Choosing the right TPA
 - o Choosing the right Record-keeper
 - Choosing the right Custodian
 - o Choosing the right ERISA Fiduciary
- o A 3-8 page analysis and summary of why this plan is best for you
- 1-2 follow up virtual meetings to address any questions within 6 months after implementation
- o One full day of onsite education and advice per year
 - Helping each participant with asset allocation and investment

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choices.

Solo Small Business Retirement-Plan Setup

Cost: \$599 one-time consultation and setup fee + an ongoing advisory fee of plan assets:

\$0 - \$249,999 = 0.75% \$250,000 - \$999,999 = 0.65% \$1,000,000+ = 0.60%

What's included? (Custody at TD Ameritrade)

- 2-3 one-hour consultative meetings to flush out the right plan for you and your business
- o A 2-5 page analysis and summary of why this plan is best for you
- 1-2 one-hour meetings per year to confirm that your retirement plan is doing what it should for you
- o Ongoing investment management monitoring by a CFA
- o Access to Sona's Dimensional Fund-Based Portfolios

Educational Videos

Cost: One-time \$9.99 to \$499

The videos will range in length and topic. Topics will pertain to financial planning and investing.

Workplace Education

Cost: One-time \$499 to \$999

If traveling out of the Twin Cities area, additional costs covered by client:

- Travel:
 - o Airfare or Millage @ \$0.55 an mile will be provided
- Hotel
 - If more than 3-hour drive or flight a Hampton-Inn type hotel will be provided
- Food & Drink
 - o A \$50 per diem will be provided

These 45-minute classes/seminars will be held onsite and will delve into financial planning and investment topics. Two follow up emails pertaining to the seminar material, per attending employee, are allowed at no extra cost 30 days after the seminar. Specific investment advice is not allowed. This engagement is for

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educational purposes only.

- B) One half of one-time planning fees are paid electronically before work begins. Recurring coaching fees are billed at the end of each quarter. Retainer and AUM fees will be deducted quarterly directly from the client's account. Hourly engagements are billed weekly.
- C) Other Fees: Other than the retainer or planning fee, the only other fees will be the expense ratio of the mutual funds or ETFs, trading fees, and a possible custodian fee. The custodian will bill the brokerage or trading fees directly from the client's account while Sona will charge no commissions. The trading is done at a discount brokerage firm to be as low as possible. The expense ratio of the mutual funds and ETFs will be taken into account during portfolio construction.
- D) Retainer fees and asset under management (AUM) fees will be billed in arrears. If the relationship is terminated before the end of the quarter, the client will be billed for services used before account can be transferred.
- E) There are no other fees associated with Sona Financial. Sona Financial is a feeonly flat-fee, retainer-based or AUM advisory service.

Item 6 / Performance-Based Fees

There are no performance-based fees associated by Sona Financial.

Item 7 / Types of Clients

The typical Sona client for the One-Time Planning is usually from Generation X or Y, has kids, slightly above average income and is in the accumulation phase life. Mark has also increasingly worked with the "Sandwich Generation", parents from 44-54 years of age who are taking care of parents in addition to their own children.

The typical client for the retainer or AUM service is usually an older generation X or younger baby boomer. These clients usually have above average assets and advanced planning needs.

Item 8 / Methods of Analysis, Investment Strategies and Risk of Loss

A) Sona's portfolios are constructed with mutual funds, Exchange-Traded Funds (ETFs), and Closed-Ended Funds. Individual securities are allowed, per customer request, as long as the risk/return profile of the client is not

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sacrificed. Sona also uses options to manage or decrease risk. Sona mostly uses covered calls and protective puts, based on the client's need or market conditions. Long calls or short puts are rarely used, unless accompanied by a cash position, which is used instead of a long-only stock position. This strategy often has the same or less risk than a comparable long-only portfolio.

Although risk is at the core of everything Sona does, it mostly invests in assets that can have volatility and may lose value. The tradeoff for volatility is potentially higher long-term returns and potential inflation protection. The other risk is loss of principle. While each type of risk is present, Sona has the experience and expertise to put the client in the best possible position to not only manage but also take advantage of these risks.

B) Sona tailors each portfolio based on the risk/return profile of each client. Sona does not trade frequently or have leveraged portfolios. There may be taxes involved with investing but it is a major consideration in client conversations and portfolio construction. Because there are no commissions and the funds are held at online brokerage houses, the trading costs are a minimal consideration and are transparent to the client.

Sona may invest in illiquid securities. These securities offer correlation and yield benefits, for the tradeoff of being illiquid. The greatest risk for these types of securities is pre-mature liquidations. The limitations are taken into account with portfolio construction and as a result, usually make up a small portion of any given portfolio.

C) Sona does not recommend one particular type of security. Securities are selected based their contribution to a diversified portfolio.

Item 9 / Disciplinary Actions

- A) Sona and/or its advisors have had no legal or disciplinary events.
- B) Sona and/or its advisors have had no legal or disciplinary events.
- C) Sona and/or its advisors have had no legal or disciplinary events.

Item 10 / Other Financial Industry Affiliations

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- A) Sona and its employees do not have, nor do they have any intention of registering as a broker dealer or a registered representative of a broker dealer. Sona is a fee-only advisory firm.
- B) Sona and its employees do not have, nor do they have any intention of registering as a futures commission merchant, commodity pool operator, a commodity-trading advisor, or an associated person of the foregoing entity.
- C) Sona and its employees do not have, nor do they intend on having any relationship with any other financial institution. The only relationship Sona will have is with its custodian and that will be transparent and disclosed to the client.
- D) Sona and its employees receive no compensation from the asset managers they select. Sona has no conflict of interests with the assets it chooses for its clients.
- Item 11 / Code of Ethics, Participation or Interest in Client Transactions and Personal Trading
 - A) Sona Financial is not an SEC-registered advisor. A copy of Sona's code of ethics can be request by email or phone, using Mark.Struthers@SonaFinancial.com and 952-412-6002, respectively.
 - B) If a Sona advisor, or a related person, has a material financial interest in any security included in a Sona portfolio, it will be disclosed to the client in writing upon the start of the relationship or as soon as reasonably possible. It is usually within five business days if the relationship already exists.
 - Sona does not hold inventory on any asset to be sold to a client. Sona does not act as an investment advisor to any investment company.
 - C) If a Sona Financial advisor, or any related person, invests in the same security, or a related security, such as options or warrants that Sona also recommends to clients it will be disclosed to the client as soon as reasonably possible, usually within 5 business days. Sona would not recommend a security to a client if it did not believe in that security; as a result, securities in Sona portfolios may also be in the personal accounts of the advisor/s. Sona Financial believes in transparency and believes the disclosure of investing in the same securities as clients is not only

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important for conflict of interest discussions but also show conviction in what it recommends.

D) Sona Financial and its advisors will always trade in client accounts first and then in their own account. The client will be made aware of this via email as soon as reasonably possible, generally within 5 business days. There may be instances where the client may hold the same security as the client but have a different risk/return profile. In these cases, the trade for the advisor may come first. The client will be made aware of this action and why it happened. Sona views this as an opportunity to explore and explain a client's risk/return profile.

Sona Financial will disclose any possible conflicts of interest to clients whenever possible and as soon as practical, usually within five business days. Monitoring of advisor accounts will take place at least monthly. The reason for trading in both advisor and client accounts will be made on an individual account level and also at the macro-level in the quarterly newsletter or the monthly website newsflash.

Item 12 / Brokerage Practices

- A) All client transactions will be placed with a discount brokerage house. No commissions will be charged, only the custodian's transaction fee.
 - a. Sona does not participate in any Research or Soft Dollar arrangements.
 - b. Sona does not use a broker-dealer; as a result, there are no referral arrangements.
 - c. Sona has one custodian for all client accounts. It is chosen based on cost, execution price, the technology available to clients, and the account statement quality. The custodian will be reviewed yearly and any change would come slowly and infrequently. Since Sona does not trade frequently and the difference in execution is minimal for the major discount brokerage houses and is not relevant for mutual funds, the client is best served by using one provider. It also eliminates any possible conflict of interest.

Item 13 / Review of Accounts

A) Client accounts are reviewed at least quarterly. If the client situation warrants more frequent attention, it can be as frequently as daily. The

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client should expect a brief review at least quarterly and a detailed review at least annually.

All client reviews are currently performed or overseen by the CEO Mark Struthers.

- B) Client accounts are rebalanced and reviewed based on the initial policy statement. This is generally done quarterly, but occasionally monthly. Changes to investment models may be done as frequently as quarterly. These changes are communicated to the client via email, usually within five business days.
- C) Reports are done at least quarterly and quite often monthly.

Item 14 / Client Referrals and Other Compensation

- A) Sona does not participate in any quid-pro-quo relationship with investment management firms or wholesales; as a result, there is no conflict of interest and nothing to disclose. Sona Financial is a fee-only advisory firm. Since there are no commissions to misguide decisions, there is no need to have the typical advisor/wholesaler relationship.
- B) Sona does not have a compensation relationship with any person who is not a supervised person for client referrals.

Item 15 / Custody

Sona does not have custody of client accounts. Sona does not have discretion to move funds out of a client account. Sona's only discretion is to place trades and to change investments. Sona clients will receive statements, most often quarterly, from the custodian of the assets, most likely TD Ameritrade.

Item 16 / Investment Discretion

In order to be effective Sona Financial requires trading discretion over client accounts where Sona has ongoing management authority at Sona's custodian, usually TD Ameritrade. Sona will abide by any restrictions placed on it in the client account agreement, such as socially conscious restrictions. Other than this type of restriction, Sona will not take on clients that have additional trading restrictions.

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Sona will always have trading discretion (except for assets held away) for its clients and will never have discretion over money movements. Sona will NEVER have power of attorney for client accounts; its discretion will be limited to trading. Most often this discretion will involve rebalancing or infrequent changes in security selection. The client is made aware of any change in security selection before the change takes place.

Item 17 / Voting Client Securities

A & B) Sona will not accept authority to vote client securities. Sona will defer that responsibility to the client. Sona will make every effort to make the client aware of the option to vote. Clients will receive their proxies or solicitations directly from the custodian or transfer agent. Clients are free to call Sona Financial at 952-412-6002 for questions regarding their options.

Item 18 / Financial Information

- A) Sona Financial requires 50% of the one-time Complete Financial Planning, the Solo-Small Business Setup, and the Small-Business 401k fee to be paid in advance and the remainder upon completion of engagement and delivery of plan. The monthly retainer or AUM fees will be billed in arrears on the 1st of each month, or quarter. Payment for the educational videos is done at point of purchase. Payment for the Hourly Engagement requires 1 hour paid in advance, then remainder upon completion.
- B) There are no financial conditions that would keep Sona Financial from meeting its client's obligations.
- C) Sona Financial and its advisors and employees have at no time been the subject of a bankruptcy petition at any time.

Item 19 / Requirements for State-Registered Advisors

- A) The founder and CEO, Mark Struthers has over 15 years of industry experience. Mark's Education and Experience:
 - a. B.S. Political Science
 - b. Chartered Financial Analyst (CFA) (2003)
 - i. The CFA Program is divided into three levels of exams. When Mark took the exams, they were only offered only once a year.
 - 1. Level I Focus is Investment Tools
 - 2. Level II Focus is Asset Valuation
 - 3. Level II Focus is Portfolio Management
 - ii. The curriculum is organized into ten general topic areas that provide a framework for making investment decisions.

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- 1. I. ETHICAL AND PROFESSIONAL STANDARDS
- 2. II. QUANTITATIVE METHODS
- 3. III. ECONOMICS
- 4. IV. FINANCIAL REPORTING AND ANALYSIS
- 5. V. CORPORATE FINANCE
- 6. VI. EQUITY INVESTMENTS
- 7. VII. FIXED-INCOME INVESTMENTS
- 8. VIII. DERIVATIVES
- 9. IX. ALTERNATIVE INVESTMENTS
- 10. X. PORTFOLIO MANAGEMENT AND WEALTH PLANNING
- iii. To become a CFA candidate and enroll in the CFA Program, you must meet one of the following criteria:
 - 1. Have a bachelor's (or equivalent) degree,
 - 2. Be in the final year of a bachelor's degree program,
 - 3. Have four years of professional work experience, or
 - 4. Have a combination of professional work and university experience that totals at least four years.
- c. The candidate must then:
 - i. Pass the Level I Exam (June) (Now June & December).
 - ii. Pass the Level II Exam (June).
 - iii. Pass the Level III Exam (June).
 - iv. Have four years of professional work experience in the investment decision-making process (accrued before, during, or after participation in the CFA Program).
 - v. Join CFA Institute as a regular member.
- d. CERTIFIED FINANCIAL PLANNER(TM) CERTIFICANT, (CFP®)
 - i. CFP® Certification has four requirements:
 - 1. Education
 - a. The first step to CFP® certification is to acquire the knowledge required to deliver professional, competent and ethical financial planning services to clients, as outlined in the major personal financial planning topic areas identified by CFP Board's most recent Job Analysis Study (See the list of Principal Topics). CFP Board's coursework component requires the completion of a college-level program of study in personal financial planning, or an accepted equivalent (through Challenge Status or Transcript Review), including completion of a financial plan development (capstone) course registered with

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CFP Board. The applicant must also have earned a bachelor's degree (or higher) from a regionally-accredited college or university in order to obtain CFP® certification.

The bachelor's degree requirement is a condition of initial certification; however, it is not a requirement to be eligible to take the CFP® Certification Examination and does not need to be met before registering for the examination. CFP Board does not grant equivalencies or exceptions to the bachelor's degree education requirement.

2. Examination

a. After the education coursework requirement has been met, the applicant will register for the CFP® Certification Examination. The CFP® Certification Examination assesses the ability to apply financial planning knowledge, in an integrated format, to financial planning situations (See the Principal Knowledge Topics). Combined with the education, experience, and ethics requirements, it assures the public that the certificant has met a level of competency appropriate for professional practice.

3. Experience

a. Because CFP® certification indicates to the public the ability to provide financial planning without supervision, CFP Board requires the applicant to have three years of professional experience in the financial planning process, or two years of apprenticeship experience that meets additional requirements. Qualifying experience may be acquired through a variety of activities and professional settings including personal delivery, supervision, direct support or teaching.

4. Ethics

a. CFP® professionals agree to adhere to the high standards of ethics and practice outlined in CFP Board's *Standards of Professional Conduct* and to acknowledge CFP Board's right to enforce them through its *Disciplinary Rules and Procedures*.

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After the completed of the education, examination and experience components of the CFP® certification process, the applicant will be directed to complete a CFP® Certification Application on which they are asked to disclose information about their background, including involvement in any criminal, civil, governmental, or self-regulatory agency proceeding or inquiry, bankruptcy, customer complaint, filing, termination/internal reviews conducted by their employer or firm. CFP Board conducts a detailed background check for all candidates, including review of any disclosures made on the CFP® Certification Application. Matters that may bar them from obtaining certification are investigated in accordance with CFP Board's Disciplinary Rules and Procedures. Authorization to use the CFP® marks will not be approved until the background check and any investigation are concluded successfully.

e. Experience

- i. 2016 Present Owner and Founder of Sona Financial, LLC
- ii. 2015-2016 Consulting CFO, Benchmark Clinical Pharmacists (temporary contract position)
- iii. 2014-2015 Investment Advisor, TruStone Financial Credit Union
- iv. 2013-2015 CFA & CAIA Writer, Kaplan Test Prep
- v. 2008-2013 Investment Consultant/Portfolio Manager, Independent Contractor
- B) The founder and CEO, Mark Struthers, has several start-up businesses as clients, mostly in the healthcare industry. As of the date of this ADV, September 15, 2016, Mark has just finished acting as Chief Marketing Officer for Benchmark Clinical Pharmacists. Mark previously (from 12/1/2016 to 8/1/2016) spent 30-35 hours per week working with Benchmark. While Mark does not anticipate returning to Benchmark, he is still 5% owner of Benchmark.

Benchmark is a non-dispensing consultant pharmacy and is not publicly traded; therefore, there should be no overlap, nor conflict of interest, between Benchmark and Sona Financial.

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- C) Sona Financial does not have performance-based fees; therefore, there is no incentive for Sona to recommend an investment that may carry a higher degree of risk for the client.
- D) Neither Sona Financial, nor its advisors, have been found liable in any arbitration claim. Nor have they been found liable in a civil, self-regulatory organization, or administrative proceeding.
- E) Sona Financial does not have any relationship or arrangement with any issuer of securities.